

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Greif Riverville, LLC
861 Fibre Plant Road, Riverville, Virginia
Permit No. (SCRO-30549)

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Greif Riverville, LLC has applied for a Title V Operating Permit for its Riverville, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:_____ Date: NOVEMBER 7, 2006

Air Permit Manager:_____

Regional Director:_____

FACILITY INFORMATION

Permittee

Greif Riverville, LLC
P.O. Box 339
Amherst, VA 24521

Facility

Greif Riverville, LLC
861 Fibre Plant Road, Riverville, VA

County-Plant Identification Number: 51- 009-00022

SOURCE DESCRIPTION

NAICS 322130 – manufacturer of semichemical corrugated medium and recycled liner board

Greif Riverville LLC is a manufacturer of semichemical corrugated medium and recycled liner board. The facility has one semichemical paper machine and one recycled paperboard machine, and associated process equipment. Two natural gas/residual oil boilers, one combination fuel boiler, one chemical recovery boiler, and one natural gas/distillate oil spare boiler provide the steam requirements to the facility.

The facility is a Title V major source of Particulate Matter (PM-10), Nitrogen Oxides (NO_x), Sulfur Dioxide (SO₂), Carbon Monoxide (CO), and Volatile Organic Compounds (VOCs). This source is located in an attainment area for all pollutants, and is a PSD major source. The facility was previously permitted under the following permits:

- a Minor NSR Permit dated April 30, 1998, as amended 11/23/04 for a mixed-fuel boiler
- a Minor NSR Permit dated May 30, 2003 for an evaporator system
- a Minor NSR Permit dated October 13, 2000 for a standby boiler
- a Minor NSR Permit dated May 12, 1992, as amended October 5, 1994 and February 22, 1995 for paper machine No. 2
- a Minor NSR Permit dated April 3, 1973 for the greenfield facility

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:
(See Note 2 for abbreviations)

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity (Note 1)	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
BLR01	BLRSV01	B&W Package Boiler –North, Fired By Natural Gas and Residual Oil, 1975	224.6 MMBtu/hr	Low NOx Burner, 2000	----	Nitrogen Oxides	April 30, 1998, as amended 11/23/04
BLR02	BLRSV01	B&W Package Boiler – South, Fired By Natural Gas and Residual Oil, 1975	224.6 MMBtu/hr	----	----	----	April 3, 1973
BLR03	BLRSV03	B&W Package Boiler – Spare, Fired by Natural Gas and Distillate Oil, 1965	100 MMBtu/hr	----	----	----	October 13, 2000
BLR05	BLRSV05	Foster Wheeler Combination Boiler, Fired by Natural Gas, Woodwaste, Tire Derived Fuel (TDF), and Old Corrugated Container Reject Material (OCCR), 2000	244 MMBtu/hr	Research Cottrell Electrostatic Precipitator, 2000	BLRCD05	PM	April 30, 1998, as amended 11/23/04
Woodyard							
WDY01	WDYSV01 (fugitive)	Various Woodyard Equipment and Vehicular Traffic	----	----	----	----	April 3, 1973
Unbleached Pulp Mill							
UPM01	BLRSV05	Bauer M&D Digester System, 1975	26 ODTP/hr	NCG Control System in accordance with MACT I	BLR05 (primary) BLR01 or BLR02 (backup)	Total HAP	April 3, 1973
Emission	Stack ID	Emission Unit Description	Size/Rated	Pollution Control Device	PCD ID	Pollutant	Applicable

Unit ID			Capacity (Note 1)	(PCD) Description		Controlled	Permit Date
UPM03	UPMSV03	IMPCO #1 Brownstock Washer, 1975	26 ODTP/hr	----	----	----	April 3, 1973
UPM04	UPMSV04	IMPCO #2 Brownstock Washer, 1975	26 ODTP/hr	----	----	----	April 3, 1973
UPM05	UPMSV05	IMPCO #3 Brownstock Washer, 1975	26 ODTP/hr	----	----	----	April 3, 1973
UPM07	BLRSV05	RECO Combined Condensate Tank / Washer Showers Supply Tanks, 1975 1993	2,830 gal 1,550 gal	NCG Control System in accordance with MACT I	BLR05 (primary) BLR01 or BLR02 (backup)	Total HAP	----
Chemical Recovery							
CR01	CRSV01	RECO Weak Liquor Storage Tanks (2), 1975	988,887 gal	----	----	----	April 3, 1973
CR03	CRSV03	RECO Heavy Black Liquor Storage Tank, 1975	120,132 gal	----	----	----	April 3, 1973
CR04	BLRSV05	Nash Evaporator Vacuum Pump, 1975	26 ODTP/hr	NCG Control System in accordance with MACT I	BLR05 (primary) BLR01 or BLR02 (backup)	Total HAP	April 3, 1973
CR04A	BLRSV05	Ultra High Solids Crystallizer, 2003	9.375 TBLS/hr	NCG Control System in accordance with MACT I	BLR05 (primary) BLR01 or BLR02 (backup)	Total HAP	May 30, 2003
CR05	CRSV05	B&W Recovery Boiler, 1975	11.7 TBLS/hr, 625 gal #6 oil/hr	B&W Dry Bottom 3 Field Electrostatic Precipitator	CRC05	PM	April 3, 1973
CR06	CRSV06	RECO Smelt Dissolving Tank, 1975	11.7 TBLS/hr	----	----	----	April 3, 1973

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity (Note 1)	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
#1 Paper Machine							
PM01	PMSV01 (fugitive)	RECO #1 Paper Machine HD Storage Tank, 1975	615,628 gal	----	----	----	April 3, 1973
PM02	PMSV02 (fugitive)	Beloit #1 Paper Machine Wet End, 1975	40 ADTFP/hr	----	----	----	April 3, 1973
PM03	PMSV03 (fugitive)	Beloit #1 Paper Machine Dry End, 1975	40 ADTFP/hr	----	----	----	April 3, 1973
#2 Paper Machine							
PM04	PMSV04 (fugitive)	Beloit #2 Paper Machine, including starch silo, 1993	45 ADTFP/hr	----	----	----	May 12, 1992, as amended October 5, 1994 and February 22, 1995
Wastewater Treatment Plant							
WWT01	WWTSV01 (fugitive)	Wastewater Treatment Plant, 1975	7.0 MGD	----	----	----	April 3, 1973

Notes:

1. The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.
2. Abbreviations: ADTFP = Air Dried Ton of Finished Paper; ODTP = Oven Dry Tons of Pulp; TBLS = Tons of Black Liquor Solids

EMISSIONS INVENTORY

A copy of the 2005 annual emission update is attached. Emissions are summarized in the following tables.

2005 Actual Emissions

	[year] Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO ₂	PM ₁₀	NO _x
Total	178	2108	1615	147	576

2005 Facility Hazardous Air Pollutant Emissions

Pollutant	2005 Hazardous Air Pollutant Emission in Tons/Yr
Acetaldehyde	17.6
Benzene	0.9
Formaldehyde	0.1
Hydrochloric Acid	0.3
Methyl Ethyl Ketone	4.2
Methanol	132.6
Ammonia	3.8
Nickel Compounds	0.4
Lead	0.0
Styrene	0.1
Toluene	0.2
Total Reduced Sulfur	3.7

EMISSION UNIT APPLICABLE REQUIREMENTS

All condition numbers refer to conditions in the current renewal of the Title V permit unless otherwise indicated.

See the Addendum to the 2001 Statement of Basis (addendum dated 12/16/04) for additional background on the emission unit applicable requirements.

I. Fuel Burning Equipment Requirements

A. B&W Package Boiler – North (Ref. No. BLR01) and the B&W Package Boiler – South (Ref. No. BLR02)

Limitations

Conditions III.A.1.a, b, d, and g are the state Standards and Conditions for Granting Permits requirements from Conditions 8, 9, 10, 20, and 21 of the Minor NSR Permit issued April 30, 1998, as amended 11/23/04.

Condition III.A.1.c is the periodic monitoring requirement for allowable fuel sulfur content.

Condition III.A.1.e contains the state emission standards for Fuel Burning Equipment in accordance with 9 VAC 5-50-10 D.

Condition III.A.1.f is the state new source standard for Visible Emissions.

Monitoring

Condition III.A.2.a is the periodic monitoring requirement for visible emissions and requires weekly observations.

Recordkeeping

Condition III.A.3 contains the recordkeeping requirements from Condition 23 the Minor NSR Permit issued April 30, 1998, as amended 11/23/04, and from 9 VAC 5-80-110.

Testing

Condition III.A.4 is the test port requirement from Condition 19 the Minor NSR Permit issued April 30, 1998, as amended 11/23/04.

Reporting

Condition III.A.5. is the general reporting requirement from 9 VAC 5-80-110 F.

B. B&W Package Boiler – Spare (Ref. No. BLR03)

Limitations

Conditions III.B.1.a, b, c, and d are new and modified source limitation requirements from Conditions 4, 6, 5, and 8 of the Minor NSR Permit issued October 13, 2000.

Condition III.B.1. e is the new source visible emission standard from Condition 9 of the Minor NSR Permit issued October 13, 2000.

Condition III.B.1.f is the operation and maintenance training requirements in accordance with 9 VAC 5-80-110.

Monitoring

Conditions III.B.2.a, and b are new and modified source monitoring-type requirements from Conditions 3, and 7 of the Minor NSR Permit issued October 13, 2000.

Condition III.B.2.c is the periodic monitoring requirement for visible emissions and requires weekly observations.

Recordkeeping

Condition III.B.3 contains the recordkeeping requirements from Condition 10 of the Minor NSR Permit issued October 13, 2000.

Testing

Condition III.B.4.a is the test port requirement from Condition 11 the Minor NSR Permit issued October 13, 2000.

Condition III.B.4.b is the emission testing requirement for NO_x and SO₂ in accordance with 9 VAC 5-80-110 E.

Reporting

Condition III.B.5 contains the general reporting requirements from 9 VAC 5-80-110 F.

C. Foster Wheeler Combination Boiler (Ref. No. BLR05)

Limitations

Conditions III.C.1.a, b, f, g, and h are the state BACT requirements from Conditions 3, 4, 12, 13, 20, and 21 of the Minor NSR Permit issued April 30, 1998, as amended 11/23/04.

Note: Condition III.C.1.g sets the state BACT opacity at 10 percent, generally.

Compliance with this limit insures compliance with the applicable NSPS Db limit for the same emission unit of 20 percent.

Conditions III.C.1.c, d, and e is the state Standards and Conditions for Granting Permits requirements from Conditions 5, 6, and 7 of the Minor NSR Permit issued April 30, 1998, as amended 11/23/04.

Condition III.C.1.i is from Condition 11 of the Minor NSR Permit issued April 30, 1998, as amended 11/23/04 and incorporates by reference NSPS Subpart Db

Monitoring

Conditions III.C.2.a, and b are the continuous monitoring requirements from Condition 17 of the Minor NSR Permit issued April 30, 1998, as amended 11/23/04.

Condition III.C.2.c defines the record retention requirement for continuous monitoring data.

Condition III.C.2.d references section **VIII.B** in the renewal permit. Section **VIII.B** implements the monitoring requirements of 40 CFR 63, Subpart DDDDD, the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.

Recordkeeping

Condition III.C.3.a contains the recordkeeping requirements from Condition 23 of the Minor NSR Permit issued April 30, 1998, as amended 11/23/04, and from 9 VAC 5-80-110.

Condition III.C.3.b references section **VIII.D** in the renewal permit. Section **VIII.D** implements the recordkeeping requirements of 40 CFR 63, Subpart DDDDD

Testing

Condition III.C.4.a is the test port requirement from Condition 19 the Minor NSR Permit issued April 30, 1998, as amended 11/23/04.

Condition III.C.4.b is the emission testing requirements for PM, and PM10 in accordance with 9 VAC 5-80-110 E.

Condition III.C.4.c references section **VIII.C** in the renewal permit. Section **VIII.C** implements the testing requirements of 40 CFR 63, Subpart DDDDD.

Reporting

Condition III.C.5a is the excess emissions and monitor performance reporting requirement from Condition 17 the Minor NSR Permit issued April 30, 1998, as amended 11/23/04.

Condition III.C.5b contains the general reporting requirements from 9 VAC 5-80-110 F.

Condition III.C.5c references section **VIII.E** in the renewal permit. Section **VIII.E** implements the testing requirements of 40 CFR 63, Subpart DDDDD.

II. Process Equipment Requirements

A. Woodyard Equipment Requirements (Ref. No. WDY01)

Limitations

Condition IV.A contains the state fugitive dust/emissions standard in accordance with 9 VAC 5-50-90.

There are no unit specific Monitoring, Recordkeeping, Testing, or Reporting applicable requirement for the woodyard.

B. Unbleached Pulp Mill Equipment Requirements

Limitations

Condition IV.B.1a contains the HAP emissions control requirement in accordance the 40 CFR 63 Subpart S, National Emission Standards for Hazardous Air Pollutants for Source Category: Pulp and Paper Production.

Condition IV.B.1b is the state new source standard for Visible Emissions.

Condition IV.B.1c is the throughput limit from Condition 5 of the Minor NSR Permit issued May 30, 2003.

Monitoring

Condition IV.B.2.a is the periodic monitoring requirement for visible emissions and requires weekly observations.

Condition IV.B.2.b references section **VI** in the renewal permit. Section **VI** implements the requirements of 40 CFR 63, Subpart S.

Recordkeeping

Condition IV.B.3.a contains the recordkeeping requirements from Condition 7 the Minor NSR Permit issued Man 30, 2003, and from 9 VAC 5-80-110.

Condition IV.B.3.b references section **VI** in the renewal permit. Section **VI** implements the requirements of 40 CFR 63, Subpart S.

Testing

Condition IV.B.4.a is the test port requirement in accordance with 9 VAC 5-50-30.

Condition IV.B.4.b references section **VI** in the renewal permit. Section **VI** implements the requirements of 40 CFR 63, Subpart S.

Reporting

Condition IV.B.5.a is the general reporting requirement from 9 VAC 5-80-110 F.

Condition IV.B.5.b references section **VI** in the renewal permit. Section **VI** implements the requirements of 40 CFR 63, Subpart S.

C. Chemical Recovery Equipment Requirements

Compliance Assurance Monitoring (CAM)

Generally, the requirements of 40 CFR 64, Compliance Assurance Monitoring (CAM) apply to each emissions unit meeting all of the following criteria at a major source required to obtain a Title V permit:

- The unit emits or has the potential to emit (in the absence of add-on control devices) quantities of one or more regulated air pollutants that exceed major source thresholds,
- The unit is subject to one or more emission limitations for the regulated air pollutants for which it is major before control, and
- The unit uses a control device to achieve compliance with one or more of these emission limitations.

The B&W Recovery Boiler (Ref. No. CR05) at Greif fulfills all three criteria and therefore, is subject to CAM.

Limitations

Condition IV.C.1.a contains the HAP emissions control requirement in accordance the 40 CFR 63 Subpart MM, National Emission Standard for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills.

Condition IV.C.1.b contains the requirement to continue to apply air pollution control to the recovery boiler pursuant to the state Standards and Conditions for Granting permits.

Condition IV.C.1.c, and d are the state new source standard for Visible Emissions.

Condition IV.C.1.e, and f contain emission limits in accordance with the state Kraft Pulp Mill standards and 40 CFR 63 Subpart MM.

Condition IV.C.1.g contains O&M requirements pursuant to the state Standards and Conditions for Granting permits.

Condition IV.C.1.h contains the Compliance Assurance Monitoring (CAM) Quality Improvement Plan (QIP) requirements in accordance with 40 CFR 64.

Monitoring

Condition IV.C.2.a, and b are the periodic monitoring requirement for visible emissions and require weekly observations.

Condition IV.C.2.c references section **VII** in the renewal permit. Section **VII** implements the requirements of 40CFR 63, Subpart MM.

Condition IV.C.2.d references the attached CAM Plan for additional monitoring requirements.

Recordkeeping

Condition IV.C.3.a contains the recordkeeping requirements from 9 VAC 5-80-110.

Condition IV.C.3.b contains O&M recordkeeping requirements pursuant to the state Standards and Conditions for Granting permits.

Condition IV.C.3.c references section **VII** in the renewal permit. Section **VII** implements the requirements of 40CFR 63, Subpart MM.

Condition IV.C.3.d references the attached CAM Plan for additional documentation requirements.

Testing

Condition IV.C.4.a is the test port requirement in accordance with 9 VAC 5-50-30.

Condition IV.B.4.b references section **VII** in the renewal permit. Section **VII** implements the requirements of 40 CFR 63, Subpart S.

Reporting

Condition IV.C.5.a is the general reporting requirement from 9 VAC 5-80-110 F.

Condition IV.C.5.b references section **VII** in the renewal permit. Section **VII** implements the requirements of 40 CFR 63, Subpart S.

Condition IV.C.5.c references the attached CAM Plan for additional reporting

requirements.

D. #1 Paper Machine Equipment Requirements

Limitations

Condition IV.D.1.a is the state new source standard for Visible Emissions.

Monitoring

Condition IV.D.2a is the periodic monitoring requirement for visible emissions and requires weekly observations.

Recordkeeping

Condition IV.D.3 contains the recordkeeping requirements from 9 VAC 5-80-110.

Testing

Condition IV.D.4 is the test port requirement in accordance with 9 VAC 5-50-30.

Reporting

Condition IV.D.5 is the general reporting requirement from 9 VAC 5-80-110 F.

E. #2 Paper Machine Equipment Requirements (Ref. No. PM04)

Limitations

Condition IV.E.1.a is the state Standards and Conditions for Granting Permits requirements from Condition 3 of the Minor NSR Permit issued May 12, 1992, as amended October 5, 1994 and February 22, 1995.

Condition IV.E.1.b is the state new source standard for Visible Emissions.

Condition IV.E.1.c is the state BACT requirement from Condition 4 of the Minor NSR Permit issued May 12, 1992, as amended October 5, 1994 and February 22, 1995.

Monitoring

Condition IV.E.2 is the periodic monitoring requirement for visible emissions and requires weekly observations.

Recordkeeping

Condition IV.E.3 contains the recordkeeping requirements from Condition 6 of the Minor NSR Permit issued May 12, 1992, as amended October 5, 1994 and February 22, 1995.

Testing

Condition IV.E.4 is the test port requirement in accordance with 9 VAC 5-50-30.

Reporting

Condition IV.E.5 is the general reporting requirement from 9 VAC 5-80-110 F.

III. MACT Requirements

A. Startup, Shutdown, and Malfunction Plan Requirements

The boiler MACT affected facility was added to the lists of equipment that requires a startup, shutdown, and malfunction plan.

B. MACT I (Subpart S) Requirements

No change.

C. MACT II (Subpart MM) Requirements

This section was updated to specify monitoring and related applicable requirements be in accordance with the approved site specific monitoring plan for the recovery boiler.

D. Boiler MACT Requirements

This section was added for the combination boiler. The statement of the applicable requirements is general in nature since the provisions of Subpart DDDDD are not currently considered mature.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.1-20.01:2 and §10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement No. 2-2003".

F. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

STATE ONLY APPLICABLE REQUIREMENTS

None

FUTURE APPLICABLE REQUIREMENTS

None at this time

INAPPLICABLE REQUIREMENTS

None Identified.

COMPLIANCE PLAN

None at this time

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110. Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation ¹ 9 VAC 5-80-720_	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
BLR07	Boiler Water, Steam and Condensate Treatment Storage Tanks. Cooling towers and corrosion control/biocide tanks raw water biocide tanks	A	----	----
BLR08	Boiler Fuel Oil Storage Tanks (#6 and #2) and additives	B	VOC	----
BLR09	Fly Ash Handling	B	Particulate Matter	----
WDY02	Log Debarking	B	Particulate Matter	----
WDY03	Chipping	B	Particulate Matter	----
WDY04	Screening	B	Particulate Matter	----
WDY05	Fines Handling	B	Particulate Matter	----
WDY06	Roundwood Unloading/Loading	B	Particulate Matter	----
WDY07	Pile Erosion (Chips, Bark and Logs)	B	Particulate Matter	----
WDY08	Chip Transport	B	Particulate Matter	----
WDY09	Bark Hogging	B	Particulate Matter	----
WDY10	Fuel Handling	B	Particulate Matter	----
UPM06	#1 and #2 paper machine bulk chemical storage tanks including: Defoamers, dispersants, cleaners, biocides, wet end additives, dry end additives, wetting agents, retention aids, dyes	B	VOC	----
UPM08	Chip Presteamer	B	VOC	----
CR02	Intermediate Liquor Tank	B	Acetaldehyde, Benzene, MIBK, Toluene, M-, O-, P-Xylene, Styrene, Methanol, VOC	----

Emission Unit No.	Emission Unit Description	Citation ¹ 9 VAC 5-80-720_	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
CR06	Precipitator Mix Tank	B	Acetaldehyde, Benzene, Styrene, Methanol, VOC	----
CR07	Green Liquor System (Dregs Washer, Green Liquor Clarifier, and Cooking Liquor Mix Tank)	B	Acetaldehyde, Benzene, Styrene, Methanol, VOC	----
CR08	Chemical Recovery and Pulp Mill Tank Farm (Phosphoric Acid Storage Tanks, Caustic Storage Tanks and Railcars, Soda Ash Storage Tanks and Railcars, HCl Storage Tank, Neutralizing Tank)	B	----	----
PM05	#1 and #2 Paper Machine Hydraulic Drive System Storage Tanks	B	VOC	----
REC01	OCC Facility	B	VOC	----
WWT02	Wastewater Treatment Chemical Storage Tanks (Polymers, Nutrients and Sodium Hydrochlorite)	B	VOC	----
WWT04	Compost System	B	Particulate Matter	----
MIS01	Rolling Stock Fuel Storage Tanks (Diesel, Unleaded Gas)	B	VOC	----
MIS02	Used Oil Storage Tanks	B	VOC	----
MIS03	Landfill	B	Particulate Matter	----
MIS04	Solvent Based Parts Washer	B	VOC	----

¹ The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in the Lynchburg News and Advance from 9/21/06 to 10/23/06.